

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON

JAMES RODDEN, *et. al.*,  
*Plaintiffs,*

v.

ANTHONY FAUCI, *et. al.*,  
*Defendants,*

Civil Action No. :

DECLARATION OF MICHELLE MORTON

1. I am Michelle Morton, a resident of Florida and, of legal age and I make this declaration on personal knowledge.

2. I am a civilian employee of The Federal Aviation Administration and work as an Air Traffic Controller. I have been working for the Federal Government for 14 years.

3. I am long term Covid-19 antibody positive (blood tested), and I was symptomatic and confirmed positive of Covid-19 infection on July 9, 2021, via PCR testing.

4. I have taken antibody tests on September 25, 2021 and been confirmed as having robust natural immunity to Covid-19.

5. My employer, The Federal Aviation Administration, has stated pursuant to Presidential Executive Order and follow-on rules to require me to be vaccinated.

6. It is my belief, based on evidence, that I am neither in danger nor am I a danger to others.

7. I wish to make my own medical choices and am fearful of a government employer declaring this attack on my bodily integrity with no reasonable cause.

8. The pressure put on me to conform—with threatened termination by November 9, 2021, if not earlier is enormous-and should I conform, it would prevent an adjudication of my constitutional and statutory rights to informed consent and bodily integrity.

9. Putting aside the uselessness of a vaccine to someone with natural immunity and the safety of the various emergency use vaccines have not been studied long term, and short term side effects can range from fatigue and a sore arm to Guillain-Barre syndrome, anaphylaxis, myocarditis and death.

10. I do not believe my employer can, nor do I want to, be able to force me to accept dangerous side effects whenever it likes on pain of termination for no known improvement of the safety of others.

11. Taking the vaccine, which for me is a medically useless act, would irreparably harm me in my person and in my control over my life and body.

12. Even should I prevail in some separate forum after threatened termination the time out of the labor force, effect on my psyche and well-being would never be recovered.

I declare under penalty of perjury the foregoing is true and correct.

Date: 11/04/2021

A handwritten signature in cursive script, appearing to read "Michelle Morton", written over a horizontal line.

Michelle Morton